



FEDERAL ELECTION COMMISSION
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February 23, 1996

MEMORANDUM

TO: The Commission

THROUGH: John C. Surina
Staff Director

FROM: Lawrence M. Noble
General Counsel

N. Bradley Litchfield
Associate General Counsel

Jonathan Levin
Senior Attorney

AGENDA ITEM
For Meeting of: **MAR 7 1996**

SUBJECT: Amendments to Draft of AO 1996-4

On February 22, 1996, the Office of General Counsel circulated, on a tally basis, a draft of Advisory Opinion 1996-4 for approval by the Commission. This memorandum is being circulated to amend the draft at a number of points. None of the amendments change the substantive analysis or conclusions of the draft. The amendments are as follows:

Page 1, line 28 - The citation should be changed to state: "See 26 CFR 701.9006-1(b), (c), and (d), and 702.9037-1."

Page 4, line 6 - The word "account" should be added after the word "depository."

Page 5, lines 15-16 - The phrase beginning with the words "the lesser" should be amended to state: "the lesser of the amount **of contributions submitted** for matching and the net outstanding campaign obligations." The new or changed words are in bold.

Memorandum to the Commission

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Page 6, line 23 - In the sentence beginning with the word "Specifically," the word "qualified" should be inserted before the word "campaign."

Page 8, footnote 9 - On the second line, the phrase beginning with the word "would" should be amended to state: "would be to attempt to obtain a loan from a lending institution." The new or changed words are in bold.

This office will also add a parenthesis mark before the "11" in the citation at the bottom line of footnote 9.

The circulation of these amendments does not change the voting deadline for the AO draft.